

With the assent of the government, defendant Todd Blake ("Mr. Blake") respectfully moves this Honorable Court to defer by approximately 75 days his self-surrender to the Bureau of Prisons ("BOP") from the presently-scheduled date of April 26, 2021 to July 12, 2021. Mr. Blake has pleaded guilty and has accepted responsibility for his crime. He is not looking to avoid or reduce his punishment. He fully intends to serve the four-month sentence imposed by the Court. Mr. Blake seeks only to defer his self-surrender date so that his period of incarceration does not overlap with that of his wife, Diane Blake ("Mrs. Blake"), who will begin serving her sentence tomorrow, April 13, 2021. Mr. and Mrs. Blake wish to ensure appropriate parenting arrangements for their children once Mrs. Blake is released from prison but before Mr. Blake reports to prison.

On November 17, 2020, this Court sentenced Diane Blake to a period of 6 weeks imprisonment and Todd Blake to a period of 4 months imprisonment for their roles in the college admissions scandal. ECF Nos. 1642, 1644. Based upon their ongoing parenting responsibilities,

at the request of the Blakes (and with the assent of the government), the Court agreed to stagger the Blakes' respective report dates to the Bureau of Prisons by several months. The Court set a report date of February 15, 2021 for Diane Blake and a report date of April 26, 2021 for Todd Blake. *Id.*

With the assent of the government, on February 4, 2021, Mrs. Blake moved to defer her self-surrender date by 60 days, due to then ongoing Covid-19 considerations. ECF No. 1713. The Court allowed the motion and set a new report date of April 13, 2021 for Mrs. Blake. ECF No. 1714. As noted above, Mrs. Blake will begin serving her sentence on that date (tomorrow).

Consistent with the staggered report dates that were originally scheduled by the Court and for the same reasons that were originally set forth by the Blakes, Todd Blake now seeks to defer his self-surrender date by approximately 75 days to July 12, 2021. Mr. Blake respectfully submits that such a deferral of his self-surrender date will allow Mr. Blake and his wife to ensure appropriate parenting arrangements for their children once Diane Blake is released from prison and before Mr. Blake reports.

Accordingly, with the assent of the government, Mr. Blake, who wholly accepts the sentence imposed by the Court and intends to serve it in full, respectfully requests that the Court defer his self-surrender date to July 12, 2021.

Respectfully submitted,

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Counsel for Todd Blake

Date: April 12, 2021

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, David E. Meier, hereby certify that I have conferred with counsel for the government in an attempt to resolve or narrow the issues raised in this Motion. The government assents to the Motion.

/s/ David E. Meier
David E. Meier

CERTIFICATE OF SERVICE

I, David E. Meier, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 12, 2021.

/s/ David E. Meier
David E. Meier